

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

COUDERT BROTHERS LLP,

Debtor.

Bankruptcy Court
Case No. 06-12226 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

AKIN GUMP STRAUSS HAUER & FELD LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1490 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

ARENT FOX LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1491 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DORSEY & WHITNEY LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1492 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DUANE MORRIS LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1493 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1494 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY and SCOTT JONES,

Defendants.

Bankruptcy Court
Adv. Pro. No. 08-1446 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY and
GEOFFROY DE FOESTRAETS,

Defendants.

Bankruptcy Court
Adv. Pro. No. 08-1433

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY and
JINGZHOU TAO,

Defendants.

Bankruptcy Court
Adv. Pro. No. 08-1486 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

K&L GATES LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1495 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

MORRISON & FOERSTER LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1496 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

SHEPPARD MULLIN RICHTER & HAMPTON LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 08-1500 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DLA PIPER (US) LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 09-1148 (RDD)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DECHERT LLP,

Defendant.

Bankruptcy Court
Adv. Pro. No. 09-1149 (RDD)

TO: David J. Adler
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*Counsel for Plaintiff
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**NOTICE OF MOTION TO WITHDRAW THE
REFERENCE AND FOR ABSTENTION**

RELIEF IS SOUGHT from a United States District Judge of the United States District Court for the Southern District of New York pursuant to 28 U.S.C. §§ 157(d) and 1334(c)(1) and Rules 5011(a) and 9033(b) of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”).

PLEASE TAKE NOTICE that upon the accompanying joint memorandum of law, the Declaration of Claire L. Huene, dated August 24, 2011, and the exhibits thereto, and all prior pleadings and proceedings herein, the law firm defendants in the above-referenced adversary

proceedings, Akin Gump Strauss Hauer & Feld LLP, Arent Fox LLP, Dorsey & Whitney LLP, Duane Morris LLP, Jones Day, K&L Gates LLP, Morrison & Foerster LLP, Sheppard Mullin Richter & Hampton LLP, DLA Piper LLP (US), and Dechert LLP (collectively, the “Law Firm Defendants”), will move the United States District Court for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, at such time as is designated by the Court, for an Order (1) pursuant to 28 U.S.C. § 157(d) and Bankruptcy Rule 5011 withdrawing the reference of the above-referenced adversary proceedings from the United States Bankruptcy Court for the Southern District of New York, (2) for abstention pursuant to 28 U.S.C. § 1334(c)(1); or (3) in the alternative to abstention, for an order converting the Bankruptcy Court’s conclusions of law on a dispositive issue central to these adversary proceedings to proposed conclusions pursuant to 28 U.S.C. § 157(c)(1) and Bankruptcy Rule 9033(b).

Pursuant to Local Rule 5011-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, the Law Firm Defendants submit these motions to the Clerk of the Court of the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 6.1(b) of the Local Rules of the United States District Court for the Southern District of New York, any answering memoranda shall be served within fourteen (14) days after service of the moving papers, and reply memoranda shall be served within seven (7) days after service of the answering papers.

Dated: New York, New York
August 24, 2011

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of August 2011, I caused the forgoing Notice of Motion and accompanying Declaration of Claire L. Huene, and exhibits thereto, to be served by hand on counsel for Development Specialists, Inc.

Dated: New York, New York
August 24, 2011

/s/ Claire L. Huene
Claire L. Huene